

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff,

Plaintiff,

v.

SHARON KNEE,

Defendant.

Adv. Pro. No. 10-04986 (CGM)

**STIPULATION AND ORDER TO EXTEND RESPONSE  
DEADLINE AND ADJOURN ARGUMENT DATE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the substantively consolidated chapter 7 estate of Bernard L. Madoff

individually, by and through his counsel, Baker & Hostetler LLP, and Sharon Knee (“Defendant”) by and through her counsel, Hogan & Cassell, LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

**WHEREAS**, on August 24, 2022, the Trustee filed his motion for summary judgment (the “Motion”) in the above-referenced adversary proceeding, ECF Nos. 60–66;

**WHEREAS**, on September 6, 2022, Michael Cassell of Hogan & Cassell, LLP appeared on behalf of the Defendant;

**WHEREAS**, the Parties conferred and agreed to request that the hearing on the Motion be adjourned from September 14, 2022 to October 19, 2022 at 10:00 am (prevailing Eastern time); and

**WHEREAS**, the Parties further agreed to request that Defendant’s response to the Motion be due on October 10, 2022 and the Trustee’s reply in further support of his Motion be due October 14, 2022.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the Parties, and **SO ORDERED**, by the Court, that:

1. Defendant shall submit her opposition to the Trustee’s Motion on or before October 10, 2022.
2. The Trustee shall submit his reply in further support of his Motion on or before October 14, 2022.
3. The hearing on the Motion is adjourned from September 14, 2022 to October 19, 2022 at 10:00 am (prevailing Eastern time).

Dated: September 6, 2022  
New York, New York

/s/ Nicholas J. Cremona

Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter  
7 Estate of Bernard L. Madoff*

/s/ Michael Cassell

Hogan & Cassell, LLP  
500 North Broadway, Suite 153  
Jericho, New York 11753  
Telephone: (516) 942-4700  
Facsimile: (516) 942-4705  
Michael Cassell  
Email: mcassell@hogancassell.com

*Attorney for Defendant*

**Dated: September 7, 2022  
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris  
U.S. Bankruptcy Judge**